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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re:  
PURDUE PHARMA L.P., et al.,**

**Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**(Jointly Administered)**

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**THE NAS CHILDREN AD HOC COMMITTEE'S JOINDER TO THE AD HOC GROUP  
OF NON-CONSENTING STATES' STATEMENT REGARDING THE MOTION TO  
INTERVENE AND UNSEAL JUDICIAL RECORDS BY DOW JONES & COMPANY, INC.,  
BOSTON GLOBE MEDIA PARTNERS, LLC AND REUTERS NEWS & MEDIA, INC.**

The Ad Hoc Committee of NAS Children (the "NAS Committee"), by and through their respective undersigned counsel, respectfully submits this Joinder (the "Joinder") to the Ad Hoc Group of Non-Consenting States' Statement (the "NCSG Statement") [Docket No. 2065] Regarding the Motion (the "Motion") to Intervene and Unseal Judicial Records by Dow Jones & Company, Inc.,

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Boston Globe Media Partners, LLC and Reuters News & Media, Inc. (the “NCSG Statement”) [Docket No. 2065]; [Docket No. 2022].<sup>2</sup>

### **JOINDER**

1. The NAS Committee hereby joins the NCSG Statement and respectfully incorporates the arguments set forth therein as if fully set forth herein. The NAS Committee strongly agrees with the NCSG that transparency in these chapter 11 proceedings is of paramount importance. Disclosure of the information concealed can only serve to advance the care and treatment of hundreds of thousands of children that suffer each day from injuries sustained *in utero* due to involuntary exposure to adult-prescribed opioids, such as Purdue’s products.

2. The NAS Committee can’t conceive of any reason that the information that is the subject of the Motion should remain locked away from inspection by the NAS Committee, the scientific and medical communities, nor the general public at large. It stands to reason that disclosure will advance understanding that can only improve the effectiveness and success of the NAS Medical Monitoring/Surveillance Program (and enhance the body of knowledge of the medical, scientific, and addiction communities) in identifying the harms associated with, for instance, opioid use disorder (OUD) and neonatal abstinence syndrome (NAS), matters of national importance.

3. Nothing contained herein shall constitute a waiver of any rights or remedies of the NAS Committee under title 11 of the United States Code or applicable law, including, without limitation, the right to (i) amend, modify, or supplement this Joinder, or (ii) raise any other additional arguments at a later date.

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<sup>2</sup> Capitalized terms used and not otherwise defined in this Limited Objection shall have the meanings ascribed to such terms in the Motion.

**CONCLUSION**

4. The NAS Committee respectfully requests that the Court (i) grant the Motion in its entirety, and (ii) grant such other and further relief as this Court deems just and proper.

Dated: December 9, 2020  
New York, NY

Respectfully submitted

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